

Fred W. Schwinn (SBN 225575)
CONSUMER LAW CENTER, INC.
12 South First Street, Suite 1014
San Jose, California 95113-2418
Telephone Number: (408) 294-6100
Facsimile Number: (408) 294-6190
Email Address: fred.schwinn@sjconsumerlaw.com

Attorney for Plaintiff
BETTY JEAN NAPIER

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

BETTY JEAN NAPIER,

Plaintiff,

v.

TITAN MANAGEMENT SERVICES, LLC,
a Georgia limited liability company, and
FREDERICK ALLEN HOWARD,
individually and in his official capacity,

Defendants.

Case No. C08-00910-RMW-RS

**REQUEST TO CONTINUE CASE
MANAGEMENT CONFERENCE AND
[PROPOSED] ORDER**

Plaintiff in the above-entitled action requests that the Court take the Case Management Conference currently scheduled for June 6, 2008. On April 24, 2008, the Court Clerk entered the default of both Defendants in this case. (Doc. 12 and 13) On May 28, 2008, Plaintiff filed a Motion for Default Judgment against both Defendants. (Doc. 17) The hearing on Plaintiff's Motion for Default Judgment is set on July 11, 2008, at 9:00 a.m. before this Court. In light of Defendants' default in this matter and Plaintiff's pending Motion for Default Judgment, Plaintiff requests that the Case Management Conference be continued to July 11, 2008.

Dated: May 28, 2008

/s/ Fred W. Schwinn

Fred W. Schwinn, Esq.
Attorney for Plaintiff
BETTY JEAN NAPIER

[PROPOSED] ORDER

Having considered the Plaintiff's Request to Continue Case Management Conference, the request is GRANTED. A Case Management Conference shall be held on July 11, 2008, at 10:30 a.m. in Courtroom 6. Plaintiff shall file a Case Management Statement no later than _____.

Dated: _____

Honorable Ronald M. Whyte
United States District Judge